

1990

For Six Month Period Ending _____
(Insert date)

Name of Registrant

Registration No. 7648

Sontheimer Hazlett, Ltd. also D/B/A Sontheimer Group, also through
Mallory Factor Inc. St. Maarten Tourist Info. office & Bonaire Tourist Bureau.
Business Address of Registrant

275 Seventh Avenue
New York, NY 10001

I-REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection
Ended

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CRIMINAL DIVISION
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INTERNAL SECURITY
SECTION
REGISTRATION UNIT

Formerly OBD-64

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?
 Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?
 Yes ☐ No ☐ N/A

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name of foreign principal

Date of Termination

9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish following information:

Name and address of foreign principal

Date acquired

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

Registrant is engaged as P/R counsel in the United States for the purpose of promoting tourism on the island of St. Maarten, Saba St. Eustasius & Bonaire.

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
Amortized over Six month period	Gov't of Island Territory the Windward section St. Maarten	Payment for NY office suite for tourism & svces. rendered on behalf of the tourism office	\$133,900
Amortized over Six month period	Bonaire Gov't	Same as above	\$ 91,000
Total			\$224,900

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS—MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal. Gov't of Island Territory, Windward Island section of St. Maarten & Bonaire.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
	See schedule I (attached)		

Total

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following: **N/A**

☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups: **N/A**

☐ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____

21. What language was used in this political propaganda:

☐ English **N/A** ☐ Other (specify) _____

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? **N/A** Yes ☐ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐ **N/A**

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? **N/A** Yes ☐ No ☐

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☐ No ☐
 Exhibit B⁷ Yes ☐ No ☐ **N/A**

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

(PAGE 9)

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

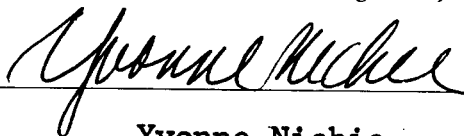
Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☐ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

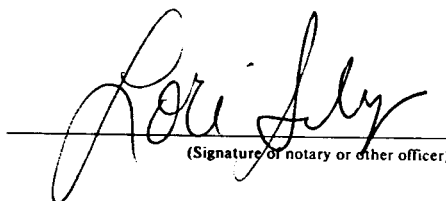
(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)


Yvonne Nichie

Subscribed and sworn to before me at 275 Seventh Avenue NY, NY 10001

this 22nd day of March, 19 90

LOUI SILBERGER
Notary Public, State of New York
No. 4924600
Qualified in Nassau County
Commission Expires 4/90


(Signature of notary or other officer)

⁸The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

DISBURSEMENTS -JULY 20 - JULY 31, 1989

[illegible]

SONTHEIMER

[illegible]

SONTHEIMER

[illegible]

SONTHEIMER

DISBURSEMENTS FOR THE MONTH OF OCTOBER 1989

Date	To the order of	Check#	SONTHEIMER
4	Burrelles Press	5184	1,012.25
4	Manhattan Couriers	5190	5.75
4	Olympic Courier	5192	75.00
4	United Parcel Service	5194	6.27
10	SAMA	5241	155.00
10	Martha Colon	5245	150.00
11	Kurt Mayer Photo	5279	60.50
11	Olympia Courier	5285	7.50
11	United Parcel	5287	20.21
11	United Parcel	5292	217.49
12	Federal Express	5299	97.00
12	SABRA Car	5300	947.70
16	NYS Corp. Tax	5302	400.00
16	NYS Corp. Tax	5303	1,399.00
16	Internal Revenue Serv.	5304	2,400.00
25	DHL Airways	5342	75.70
25	Federal Express	5344	90.00
25	Gail Knopler	5345	400.00
25	Luce Press	5350	406.62
25	John Salayi	5353	2,985.00
25	Prentice Hall	5359	65.45
25	The Trophy King	5362	104.99
25	UPS	5363	468.59
	TOTAL		11,550.02

SONTHEIMER

[illegible]

SONTHEIMNER

DISBURSEMENTS FOR THE MONTH OF DECEMBER 1989

Date	To the order of	Check#	SONTHEIMER
1	NYS Sales Tax	5575	950.00
5	Federal Express	5584	244.00
5	India House	5596	19.49
5	Am. Soc. of Travel Agt	5632	325.00
8	Petty Cash	5644	2.00
11	Olympic Courier	5648	129.40
11	Western Union	5653	39.27
11	DHL Airways	5655	93.50
13	Manhattan Courier	5684	11.50
20	Federal Express	5696	58.00
20	Brody & Weiss	5698	350.00
20	DHL Airways	5703	94.00
20	Jack Wilson Photo	5708	508.75
20	Kurt Mayer Photo	5710	1,867.45
20	Luce Press Clippinga	5713	826.06
20	Manhattan Couriers	5714	13.00
20	Olympic Courier	5720	23.00
20	UPS	5726	128.54
20	NYC Dept. of Finance	5738	1,461.24
20	NYC Dept. of Finance	5739	730.62
21	Petty Cash	5747	2.00
27	DHL Airways	5009	641.92
27	Olympic Courier	5012	14.00
28	UPS	5015	75.16
28	Admor's Officeworld	5016	44.53
28	Jon Edwards Photo	5018	200.00
28	NYS Dept. of Tax	5020	2,395.41
	TOTAL		11,247.84

SONTHEIMER

DISBURSEMENTS JANUARY 1 - JANUARY 19, 1990

Date	To the order of	Check#	SONTHEIMER
3	Burrelles Prss	5029	152.68
3	Sabra Car	5053	195.20
3	Luce Press	5055	645.22
3	Western Union	5061	24.88
8	Petty Cash	5086	38.06
8	Marine Midland	5087	500.58
10	Howard Miller Clock	5809	54.16
10	Manhattan Courier	5816	11.00
10	Copycare	5817	897.18
10	DHL Airways	5819	850.00
10	NYS Corp. Tax	5832	94.00
10	NYC Dept. of Finance	5833	363.00
10	MM Bank(1120-2nd Qtr)	5834	2000.00
10	Federal Express	5843	131.00
16	Allen Coyle	5852	250.00
16	Allen Coyle	5853	250.00
17	Sabra Car & Limo	5857	224.50
17	Copycare	5865	383.64
17	KMP	5866	80.20
17	Federal Express	5881	15.00
	TOTAL		7,160.30

SONTHEIMER

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D.C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes _____ or No _____

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes _____ or No _____

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Yvonne Nichie
Signature

March 22, 1990
Date

Yvonne Nichie
Please type or print name of signatory on the line above

President, Sontheimer Group
Title

RECEIVED
DEPT. OF JUSTICE
CRIMINAL DIVISION
90 MAR 29 10:00
INTERNAL SECURITY
SECTION
REGISTRATION UNIT